

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:19-CV-767-ECM
	)	“Unopposed”
DYNAMIC SECURITY, INC.	)	
	)	
Defendant.	)	

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**PLAINTIFF’S MOTION TO EXTEND DEADLINE TO SUBMIT  
PETITION FOR ATTORNEYS’ FEES AND COST BILL**

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COMES NOW the Plaintiff and moves this Court to enter an order extending the time for Plaintiff to submit a Petition for Attorneys’ fees and Cost Bill in this case.

In support of this motion, the plaintiff states as follows:

1. Plaintiff prevailed at trial on her retaliation claim against the Defendant and is the prevailing party.
2. Both parties filed post-trial motions requiring response and reply briefs, and consideration by the Court.
3. Attorneys’ fees will continue to accrue through the post-trial motions.

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4. Costs may increase through the post-trial motions.
5. Any filing of a Petition for Attorneys' Fees or Cost Bill would require later amendment.
6. In the interest of judicial economy and efficiency, Plaintiff requests the filing deadline for any Petition for Attorneys' Fees and Cost Bills be stayed until the conclusion of post-trial motions.
7. In the event either party files an appeal, Plaintiff may request a continued extension to be carried with the appeal.
8. Plaintiff has contacted Defendant about this motion and Defendant does not oppose.
9. Neither party will be prejudiced by this extension.

WHEREFORE, PREMISES CONSIDERED, Plaintiff seeks an order extending the deadline to submit a Petition for Attorneys' fees and Cost Bill in this case until the conclusion of post-trial motions.

Respectfully submitted,

Attorneys for Plaintiff  
/s/ Heather Leonard  
Heather Newsom Leonard  
ASB-1152-061H

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**Certificate of Service**

I hereby certify that I have filed the foregoing on the Court's CM/ECF electronic filing system which will provide notice to all counsel of record on this 3rd day of May 2023.

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OF COUNSEL

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